

EXHIBIT 10

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 Master File No. 1:17-cv-00916-RA

5 -----x
6 In Re:

7 GLOBAL BROKERAGE, INC.
8 f/k/a FXCM, INC.
9 SECURITIES LITIGATION

10 -----x
11 This Document Relates To:
12 All Actions

13 -----x
14 May 7, 2020
15 9:32 a.m.

16 Videotaped Deposition of E-GLOBAL
17 TRADE and FINANCE GROUP, INC. by SERGEY
18 REGUKH, taken by Defendants, pursuant to
19 30(b)(6) Notice, held via Veritext Zoom
20 videoconference, before Todd DeSimone, a
21 Registered Professional Reporter and Notary
22 Public of the State of New York.
23
24
25

1 REGUKH

2 are made to the documents, the initial
3 documents. So that's it.

4 Q. How many times did you speak
5 with your counsel about today's deposition?

6 A. By voice, just once.

7 Q. And when you say by voice --

8 A. I mean, yes, it was by Zoom, on
9 Zoom, so it was virtual.

10 Q. And aside from the Zoom
11 meeting, did you have any other meetings
12 with your counsel to prepare?

13 A. No.

14 Q. And when did your Zoom meeting
15 with counsel take place?

16 A. Yesterday.

17 Q. And how long did you meet with
18 your counsel for?

19 A. About 30, 40 minutes.

20 Q. And aside from your counsel,
21 have you spoken with anybody else about
22 today's deposition?

23 A. I, yes, informed my colleagues
24 that the company name of E-Global may
25 appear in the future and they have to be

1 REGUKH

2 informed that it could take place in the
3 future, but that's it.

4 Q. When you say they have to be
5 informed that it could take place in the
6 future, what are you referring to there?

7 A. To this action, I mean, to this
8 case against FXCM, because initially it
9 was -- I was a plaintiff, now the
10 company -- I mean, like the company,
11 E-Global, is instead of me. So I'm in the
12 complaint and so I informed my colleagues
13 that yes, now it is the company name
14 instead of my personal name in this case.
15 That's it.

16 Q. And did you speak with any of
17 your colleagues at E-Global about
18 categories of information identified in
19 Exhibit 19?

20 A. I send to -- we have, in the
21 company, we have a lawyer, and I send them
22 just like information about what kind of
23 questions will be to E-Global we got in
24 this case and that's it. And like also I
25 informed him that I already answered most

1 REGUKH

2 of the questions, so now I'm going to
3 answer them like representative of the
4 company. That's it. So I just informed
5 him, yeah, our lawyer, I mean, legal
6 officer, yeah, of the company.

7 Q. And aside from E-Global's
8 corporate counsel, did you talk with anyone
9 else at the company about this deposition?

10 A. No.

11 Q. Did you review any documents in
12 preparation for today's deposition?

13 A. Yeah, I read the documents, the
14 exhibits, yeah.

15 Q. I'm sorry, when you say the
16 documents, the exhibits, what documents are
17 you referring to?

18 A. I mean -- I mean the documents,
19 notice -- I mean, motion to the court about
20 replacement of my name as a plaintiff to
21 E-Global, also granted, I mean, yeah,
22 decision that I believe granted decision of
23 the court, the judge, about this motion,
24 about this replacement, also, okay, the
25 Third Amended Complaint.

1 REGUKH

2 So all the documents, as I said
3 to you, like we made the amendments and the
4 request to make these amendments, yeah.

5 Q. And did any of the documents
6 that you reviewed refresh your memory about
7 the events connected with this lawsuit?

8 A. Like in general, yes, maybe a
9 little bit here, I reviewed the complaint,
10 because complaint was absolutely the same,
11 just we added E-Global instead of me, and
12 we added a little bit -- I reviewed, again,
13 the complaint, yeah.

14 Q. And did you review the
15 transcript of the testimony that you gave
16 in this matter on March 10th, 2020?

17 A. Testimony? Could you --

18 Q. Sorry, let me clarify.

19 So as you recall, you
20 previously gave a deposition in this matter
21 in March, correct?

22 A. Uh-huh, correct.

23 Q. And that deposition was taken
24 down in a transcript by the court reporter.

25 A. Okay.

1 REGUKH

2 Q. Did you review a copy of the
3 transcript of your deposition?

4 A. No, unfortunately, but it is
5 not so big picture for me, yes, not so
6 important for me.

7 Q. Now, am I correct that E-Global
8 is a limited liability company?

9 A. Yes.

10 Q. And E-Global is incorporated in
11 the Virgin Islands -- in the British Virgin
12 Islands?

13 A. Yes.

14 Q. Now, where are E-Global's
15 physical offices located?

16 A. So we have a registered office,
17 a legal office on BVI, in BVI, and we have
18 a partner company with a staff like, as I
19 mentioned to you before in March, located
20 in Riga, like accounting function, also
21 providing with IT development and a call
22 center. So they are located in Riga.

23 Q. And when you say partner
24 company, which company are you referring
25 to?